

May 12, 2017

VIA ELECTRONIC SUBMISSION

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: SES Americom, Inc. and O3b Limited, Notice of Ex Parte Presentation in *Amendment of Parts 2 and 25 of the Commission's Rules to Facilitate the Use of Earth Stations in Motion in Frequency Bands Allocated to the Fixed Satellite Service*, IB Docket No. 17-95

Dear Ms. Dortch,

On May 11, 2017, Suzanne Malloy, on behalf of SES Americom, Inc. and O3b Limited (“the Companies”), spoke by telephone with Rachael Bender, Legal Advisor to Chairman Pai, Erin McGrath, Legal Advisor to Commissioner O’Reilly, and Daudeline Meme, Legal Advisor to Commissioner Mignon Clyburn, regarding the draft Notice of Proposed Rulemaking (“NPRM”) relating to Earth Stations in Motion (“ESIMs”) that was released on April 27, 2017, in the above-referenced proceeding. The Companies noted that NPRM states that the proceeding will only address ESIM operations by geostationary orbit (“GSO”) satellites and does not address ESIM communications with non-geostationary (“NGSO”) spacecraft.

The Companies urged the Commission to revise the NPRM to seek comment on whether the proposed rules for GSO ESIM operations should also be applied to NGSO ESIM operations. The Companies pointed out that in Europe, technical and operational standards for mobile platforms communicating with NGSO systems have been in place for nearly two years.¹ Antennas that can communicate with both GSO and NGSO satellites are already under development and available for commercial deployment.² Under these circumstances, the Companies contended that a failure to address issues relating to both types of systems simultaneously would delay licensing for ESIMs terminals that could otherwise be deployed in the U.S. commercial market for communication with both GSO and

¹ See ECC Decision 15(04), *The harmonised use, free circulation and exemption from individual licensing of Land and Maritime Earth Stations On Mobile Platforms (ESOMPs) operating with NGSO FSS satellite systems in the frequency ranges 17.3-20.2 GHz, 27.5-29.1 GHz and 29.5-30.0 GHz* (approved July 3, 2015). Provisions for GSO ESIMs have also been adopted. See ECC Decision 13(01) of the CEPT Electronic Communications Commission, *The harmonised use, free circulation and exemption from individual licensing of Earth Stations On Mobile Platforms (ESOMPs) within the frequency bands 17.3-20.2 GHz and 27.5-30.0 GHz* (approved March 8, 2013).

² See ORBIT, *Ocean TRx 7 Maritime Stabilized VSAT System*, <http://orbit-cs-usa.com/?product=oceantrx-7> (last visited May 11, 2017), describing a dual GEO/MEO-capable antenna available for commercial use.

See also Alan Boyle, *Kymeta and Intelsat Debut Kalo Satellite Service and Antennas at ‘Coming-out Party’*, GeekWire (May 7, 2017), <https://www.geekwire.com/2017/kymeta-intelsat-unveil-kalo-satellite-service-antennas/>, describing antennas designed to seamlessly switch from GEO to LEO satellites.

NGSO systems as soon as 2017, potentially leading the U.S. to lag behind other well-developed markets in deployment of multi-orbit antenna systems.

To ensure that the United States retains a leadership position in the development of advanced satellite-based mobility services, SES and O3b urge the Commission to seek comment in the NPRM as to whether technical parameters proposed for ESIM operations with GSO systems are equally appropriate for such operations with NGSO systems. Expanding the item to address ESIMs capable of communicating with both GSO and NGSO systems will ensure that the most up-to-date, innovative mobility solutions can be timely licensed and deployed in the U.S. market.

Please contact us if you have any questions about this submission.

Respectfully submitted,

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